

Exhibit B

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May 14, 2020

Paul David Stern
U.S. Attorney's Office (W.D. Tex)
601 W. Loop 410, Suite 600
San Antonio, Texas 78216

RE: Cause No. 5:18-cv-00555-XR; Holcombe, et al. v. United States of America;
In the United States District Court for the Western District of Texas – San
Antonio Division

Dear Mr. Stern:

This office is recently hired to personally represent Michael Kelley and Rebecca Kelley during the depositions to be scheduled in the above styled and numbered civil cause. Please forward for review a copy each and every statement given by Michael Kelley and Rebecca Kelley to the Federal Bureau of Investigation, A.T.F., Texas Rangers, United States Air Force, U. S. O.I.G., or any other law enforcement agency in relation to the subject matter which makes the basis of the above referenced litigation.

The incident which makes the basis of this civil litigation was a mass shooting. Had Devin Kelley survived, the United States would have indicted him for intentionally causing the death of several people and the D.O.J. would likely have authorized the pursuit of the death penalty. Any acquaintances of the perpetrator would be investigated as targets for indictment, as well. Therefore, please provide a letter stating that neither Michael Kelley nor Rebecca Kelley are targets of a criminal investigation at this time and that answers they give in response to questions during the deposition will not lead to either of them becoming targets of a criminal investigation with the United States Department of Justice. In other words, provide a letter stating they are not now targets of a criminal investigation and they will never be targets of a criminal investigation for anything related to the Sutherland Springs incident.

Sincerely,



Gerald E. Bourque

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